

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Chad Edward Hinds

Debtor 1

Coni Hinds

Debtor 2

Chapter 13

Case No. 5:22-BK-02290-MJC

Matter: Motion to Convert

DEBTOR(S)' MOTION TO CONVERT

AND NOW, come the Debtor(s), Chad Edward Hinds and Coni Hinds, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Convert and aver as follows:

1. Debtor(s) filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on November 29, 2022 and has not previously converted this case to Chapter 7.
2. Debtor(s)' Plan was "income-driven" in that Debtor(s) had sufficient disposable income to make a significant distribution to priority taxes and unsecured creditors.
3. Debtor 1 had a change in employment with income being significantly decreased which subsequently resulted in Debtor(s)' income has been significantly reduced.
4. Debtor(s) are eligible to be debtor(s) under Chapter 7 of the Bankruptcy Code.
5. Debtor(s) intends to file all Chapter 7 documents as necessary within such time as provided by the Rules.

WHEREFORE, Debtor(s) prays request for an order converting this case from a case under Chapter 13 to a case under Chapter 7.

Date: September 8, 2023

Respectfully submitted,

/s/ Chad Edward Hinds

Debtor 1

/s/ Coni Hinds

Debtor 2

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Chad Edward Hinds

Debtor 1

Coni Hinds

Debtor 2

Chapter 13

Case No. 5:22-BK-02290-MJC

Matter: Motion to Convert

ORDER OF COURT

UPON CONSIDERATION of Debtor(s)' Motion to Convert and any objections thereto, IT IS ORDERED THAT:

1. This Chapter 13 case is converted to a case under Chapter 7;
2. The Standing Chapter 13 Trustee, within 30 days of the date of this Order, shall file:
 - a. an account of all receipts and disbursements made in the Chapter 13 case; and
 - b. a report on the administration of the case pursuant to 11 U.S.C. § 704(9).
3. The Standing Chapter 13 Trustee forthwith shall turn over to Debtor(s) all records and property of the estate remaining in the Trustee's custody and control;
4. The Standing Chapter 13 Trustee or any other party entitled to compensation may, within 30 days of the date of this Order, file an application for compensation and reimbursement of expenses; and
5. Debtor(s), within 15 days from the date of this Order, shall file the statements and schedules required by Bankruptcy Rule 1007(b), if such documents have not already been filed, as well as any other appropriate amendments or documents.